

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

IN RE APACHE CORP. SECURITIES
LITIGATION

Case No. 4:21-cv-00575

District Judge George C. Hanks, Jr.

Magistrate Judge Andrew M. Edison

CLASS ACTION

**DECLARATION OF JOSHUA E. D'ANCONA IN SUPPORT OF LEAD
PLAINTIFFS' LETTER BRIEF REGARDING DISCOVERY DISPUTES**

I, Joshua E. D'Ancona, hereby declare as follows:

1. I am a partner of the law firm, Kessler Topaz Meltzer & Check, LLP, court-appointed Lead Counsel for Lead Plaintiffs the Plymouth County Retirement System and the Trustees of the Teamsters Union No. 142 Pension Fund in the above-referenced action. I am admitted to practice before this Court *pro hac vice*.

2. I submit this Declaration in support of Lead Plaintiffs' Letter Brief Regarding Discovery Disputes, and I have personal knowledge of or information bearing on the facts set forth herein.

3. Attached are true and correct copies of the following exhibits:

Exhibit 1: Lead Plaintiffs' Proposed Discovery Protocol Regarding Production of ESI and Paper Documents.

Exhibit 2: March 10, 2023 Email from Amy Hefley to Josh D'Ancona Re: APA – Ds' search term proposal.

Exhibit 3: February 25, 2023 Letter from Amy Hefley to Josh D’Ancona and David Kaplan Re: Civil Action No. 4:21-cv-00575; *In re Apache Corp. Securities Litigation*; In the U.S. District Court for the Southern District of Texas, Houston Division.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this 4th day of April, 2023.

s/ Joshua E. D’ Ancona

Joshua E. D’Ancona